

EXHIBIT “I”

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

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4 ALEX HOLMES, et al.,

5 Plaintiffs,

6 -against-

Case No.:

7:20-CV-0448-UA

7 CHET MINING CO., LLC, et al.,

8 Defendants.

-----X

9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF NEW YORK

-----X

11 ANDREW SCHWARTZBERG,

12 Plaintiff,

13 -against-

Case No.:

1:20-CV-01880

14 CHET MINING CO., LLC, et al.,

15 Defendants.

-----X

16 **DEPOSITION** in the above-entitled actions,
17 taken before Susan Florio, a Registered
18 Professional Reporter and Notary
Public in and for the State of New York by
Zoom.

19 WITNESS: **CHET STOJANOVICH, DEFENDANT**

20 PURSUANT TO: Subpoena

21 DATE: June 10, 2021

22 TIME: 1:00 p.m.-1:25 p.m.

23 HELD: Videoconference (Zoom)

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2 APPEARANCES:

3
4 E. STEWART JONES HACKER MURPHY, LLP
5 Attorneys for Plaintiffs
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CHET STOJANOVICH,
having been first duly sworn remotely by the
notary public, was examined and testified as
follows:

BY MR. HARWICK:

Q. Mr. Stojanovich, am I pronouncing your
name correctly?

A. Close enough.

Q. Okay. Do you go by Chet?

A. Chet is fine.

Q. Chet, as you know, my name is John
Harwick and I represent Alex Holmes and other
related plaintiffs in a federal court action
where you've defaulted and they've obtained
default judgments against you regarding a series
of crypto currency transactions.

Are you aware of that default judgment?

A. I'm aware of the default judgment with
Alex Holmes.

Q. You are?

A. Yeah.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. And you are not being represented by
3 counsel today. Is that correct?

4 A. I don't have counsel today. I couldn't
5 arrange for counsel.

6 Q. Do you want to have counsel present for
7 this deposition?

8 A. It would have been ideal, but this is the
9 day you had available, correct?

10 Q. I can't hear you, Chet.

11 A. It would have been ideal, but this is the
12 day you had available, correct?

13 Q. Well, are you represented by counsel in
14 this case?

15 A. Not right now. I didn't have counsel for
16 this meeting.

17 Q. Okay. But you knew about it and you had
18 the opportunity to have counsel present if you so
19 desired; is that correct? I didn't get the
20 response.

21 A. I wish I had a little more time to
22 arrange for counsel, but that's here nor there
23 because I'm here now.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. All right. Do you want me to adjourn
3 this deposition so you can get an attorney?

4 A. Do you want to adjourn the deposition? I
5 don't know if it's what's supposed to be done.

6 Q. No. I don't want to adjourn the
7 deposition, but I'm giving you the opportunity
8 now to tell me that you want counsel present and
9 we can adjourn this deposition for a week to
10 allow you to get counsel. But you can proceed on
11 your own. But it's your choice.

12 A. Let me reach -- if it's okay with you,
13 can I reach out to see if I can get counsel
14 present before we proceed today?

15 Q. Yes. Yes. That's your right. I'll
16 grant you that. I'll grant you that courtesy
17 with the understanding, Chet, that we will not
18 adjourn the deposition again and if you don't
19 show up at the adjourned deposition with counsel
20 at the rescheduled date we will be proceeding.
21 And if you don't show up at all, we will be
22 moving for an order of contempt against you to
23 hold you in contempt.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. Okay.

3 Q. I also want to note for the record that
4 we are here pursuant to a subpoena, Sue, and this
5 is in Southern District of New York for the
6 United States District Court. Civil Case No.
7 7:20-CV-0448.

8 And I'll also note, Chet, that there were
9 61 items that were requested of you pursuant to
10 the subpoena and all that you sent me was your
11 Chase account statement for Chet Mining, LLC.

12 A. There's other accounts as well. I also
13 sent over my insurance as it was, but we are
14 still trying to get the rest of that right now
15 from --

16 Q. Well, before we proceed and before we
17 conclude with any deposition I'll need a complete
18 response to our subpoena.

19 A. Okay.

20 Q. And you can have your attorney contact
21 me. We're going to set an adjourned date for
22 this right now.

23 A. All right.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Chet, how is a week from today?
3 Thursday, June 17th, at 10 a.m.?

4 A. I have to check to see if I have an
5 appointment that morning with a doctor.

6 Q. Well, can you pull up your calendar?

7 A. Yeah. I have it up right now. I have it
8 open right now.

9 Q. All right. Why don't we pick a different
10 date.

11 A. Yeah.

12 Q. I'm looking at that.

13 A. If that's okay.

14 Q. Um-hmm. How about Wednesday, June 23rd,
15 at 1:00 p.m.?

16 A. That seems like it will work.

17 Q. Okay. So, for the record, we are going
18 to adjourn this deposition until Thursday
19 (sic) -- June 23rd at 1:00 p.m. I would ask you
20 to try to get some better equipment next time
21 because we are having difficulty hearing you.
22 Dsometimes a phone is easiest to use. Do you
23 have an iPhone?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I have a smartphone. So, yeah, I can use
3 that. I wasn't sure if, because we were on the
4 phone if I could call in on it.

5 Q. Yeah. So, next time why don't we plan on
6 you and I can log on 15 minutes before at 12:45
7 and we can work that out.

8 A. That'll work. Work through any technical
9 difficulties.

10 Q. To work through technical difficulties.
11 Okay. And I'm going to ask you in the interim to
12 have your attorney contact me or if you decide
13 not to have an attorney to send me an e-mail to
14 that effect and also to comply fully with the
15 subpoena because that's what's required for the
16 law. But I'll let your attorney and you review
17 and respond. Okay?

18 A. All right. I appreciate the -- I
19 appreciate your time.

20 Q. Why don't you just confirm -- just before
21 we go, I want to make sure -- Chet, just before
22 we go, speak clearly and why don't you confirm
23 all of your contact information for me so I know

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 I have it correct?

3 A. All right. You have my cell phone number
4 of (310)824-3903. And we have the date scheduled
5 of Wednesday, the 23rd, at 1 p.m. We are going
6 to meet 15 minutes before to work through any
7 technical difficulties. I have
8 Chet@Chetminingco.com for my e-mail.

9 Q. I have it, Chet. So, is your e-mail
10 still Chet@ChetMiningCo.com?

11 A. That's correct.

12 Q. And is your address still 105 Duane
13 Street, Apartment 20-F, New York, New York 10007?

14 A. That's still my address.

15 Q. Okay. So, we are going to adjourn this
16 until the 23rd and if you get counsel have them
17 contact me. If you decide not to get counsel,
18 you can contact me directly and let me know that.
19 Okay?

20 A. Okay. Thank you very much for your time
21 and taking the time today and providing time to
22 reach out to counsel. I appreciate making that
23 concession and I look forward to conversing with

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 you and hopefully I can resubmit some documents
3 over to you so you have the full list that you
4 were looking for. Some of the stuff doesn't
5 apply as I've explained before, but most of the
6 stuff I'm able to get over to you.

7 Q. Okay. Good. Thank you very much. Okay.
8 We'll see you in a week or two. Okay?

9 A. Yeah. The 23rd of -- Wednesday, right?

10 Q. Right.

11 (Whereupon, the testimony of CHET
12 STOJANOVICH adjourned at 1:25 p.m.)

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3 STATE OF NEW YORK

4 COUNTY OF _____
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7 I have read the foregoing record of my
8 testimony taken at the time and place noted in the
9 heading hereof, and I do hereby acknowledge it to
10 be a true and correct transcript of same.
11
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14 _____
15 CHET STOJANOVICH
16
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18 Sworn to before me this

19 _____ day of _____, 20__.
20 _____

21 NOTARY PUBLIC
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DEPOSITION TRANSCRIPT ERRATA SHEET
ERRATA SHEET FOR TRANSCRIPT OF:
CHET STOJANOVICH - June 10, 2021

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C E R T I F I C A T I O N

I, SUSAN FLORIO, Registered Professional Reporter and Notary Public in and for the State of New York, do hereby certify that the foregoing is a true, complete and accurate transcript to the best of my knowledge, skill and ability on the date and place hereinbefore set forth.

I FURTHER CERTIFY that I am not related to or employed by any of the parties to the action in which the proceedings were taken, or any attorney or counsel employed in this action, nor am I financially interested in the case.

IN WITNESS WHEREOF, I have hereunto set my hand this 10th day of June, 2021.

SUSAN FLORIO, RPR

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying reporter.)

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